KROGER GARDIS & REGAS, LLP
ATTORNEYS

Gregory P. Cafouros
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April 30, 2021

VIA EMAIL ONLY

965908

Nicole Wood-Chi
U.S. Environmental Protection Agency, Region 5
Superfund Division Remedial Response Branch 2
Remedial Response Section 3 SR-6J
77 West Jackson Boulevard
Chicago, IL 60604-3590
wood.nicole@epa.gov

Re: Victoria Comte Revocable Trust's Good Faith Offer to U.S. EPA's November 24, 2020 Special Notice Letter for the Franklin Street Groundwater Site in Spencer, Indiana

Dear Nicole:

Our firm represents the Victoria Comte Revocable Trust "(Comte") regarding the Franklin Street Groundwater Site ("the Site") located in Spencer, Indiana. During our recent telephone conference with other potential respondents on April 8, 2021 we agreed to provide you with our good faith response to the November 24, 2020 Special Notice Letter ('SNL") Comte received from US EPA, Region V ("EPA"). We understand that similar SNLs were sent to other potentially responsible parties ("PRPs") requesting that those parties agree to conduct or finance a Remedial Investigation/Feasibility Study ("RI/FS") at the Site.

Since our call, we have been in communications with Carrie Doehrmann representing Stello Products and Erik Mroz representing the Gedigs (Coin-op Laundry). Other PRPs have been contacted but to date only Stello Products and the Gedigs have agreed to work in concert to respond to the SNLs we have received. The participation of the other dozen or more PRPs would be beneficial to this effort.

We have reviewed the technical data associated with the Franklin Street Groundwater Site, principally the report issued by the Indiana Department of Environmental Management ("IDEM") as well as other reports and summaries included in the IDEM Virtual File Cabinet. To date, there is not sufficient documentation linking the Comte site with the Town of Spencer wellfield

contamination or the Franklin Street groundwater contamination, based on the best available data reviewed. The IDEM report specifically states that the source of the contamination has not been identified.

As a consequence, our client has demurred from joining with other PRPs in conducing or financing the Remedial Investigation and Feasibility Study outlined in the Comte SNL. We are responding to our SNL separately to indicate our willingness to cooperate with all responding PRPs and with EPA, as set out in this good faith offer.

Specifically, we are responding to the seven paragraphs to be addressed in a good faith offer, as follows:

1. A statement of willingness to conduct or finance the RI/FS that is consistent with EPA's Statement of Work and Administrative Order on Consent and provides a sufficient basis for future negotiations.

To date, we have not been provided or obtained groundwater data indicating that the Comte site is a source of the Franklin Street groundwater contamination, as confirmed by IDEM. If additional data is provided or obtained which establishes the Comte site as a source, Comte will enter into good faith negotiations with EPA and other PRPs in order to arrive at a mutually agreeable Administrative Order on Consent ("AOC") to pursue an RI/FS.

In order to obtain additional soil and groundwater data, Comte and its insurer will conduct additional sampling of the Comte site. Comte has retained the services of August Mack Environmental ("A. Mack") to assist in an initial site investigation of the Comte site and to analyze the data obtained by the other responsive PRPs. http://augustmack.com/ A. Mack has prepared a scope of work and schedule to perform a coordinated initial site investigation. A copy of this work plan is attached with graphic exhibits. We would welcome EPA's review of this work plan and its synthesis with the work plans proposed by the other responsive PRP consultants. This work plan has been shared with Ms. Doehrmann and Mr. Mroz so that their respective consultants can best coordinate their efforts and scheduling of the work.

At this time, Comte cannot commit to conduct or finance an RI/FS until this work is completed and the work of the other PRP consultants is reviewed.

2. A paragraph-by-paragraph response to EPA's Statement of Work and draft Administrative Settlement Agreement and Order on Consent.

Until the initial site investigation described above is completed, we believe that a paragraph-by-paragraph response to EPA's Statement of Work and Administrative Order on Consent ("AOC") is not an efficient use of our client's limited resources. When and if additional data is obtained and reviewed which establishes the Comte site as a source of the Franklin Street groundwater contamination, we will enter good faith negotiations with EPA and the other responsive PRPs for an enforceable AOC. We can commit to negotiate an interim AOC reflecting the initial site investigation scope and goals set out above.

3. A detailed description of the work plan identifying how Comte plans to proceed with the work.

August Mack has prepared the attached work plan and procedures which comport with current EPA Guidance for conducting an RI/FS. The elements include:

- Objectives and Potential Contaminants
- Document Review
- Soil Investigation (See Figure 1, attached)
- Groundwater Investigation (See Figure 1) including monitoring well installation and monitoring protocols
- Contingent Monitoring Well Installation Activities
- Field Investigation and Reporting Requirements in coordination with other PRP consultants. Specific EPA reporting requirements to be fulfilled when provided.
- Geoprobe Drilling Soil Sampling Procedures in coordination with other PRP consultants.
- Monitoring Well Installation Procedures in coordination with other PRP consultants.
- Groundwater Level Measurements in coordination with other PRP consultants.
- Low-Flow Groundwater Sampling in coordination with other PRP consultants.
- RI/FS Tasks – risk assessment, treatability studies and remedial alternatives would be addressed in subsequent work plans after data evaluation.
- Schedule – work shall proceed upon coordination with other PRP consultants.

Compliant Sampling and Analysis Plans (SAP), Quality Assurance Project Plans (QAPP), and Health and Safety Plans (HASP) will be prepared for all Site Work.

4. A demonstration of Comte's technical capability to carry out the RI/FS, including the identification of the firm(s) that may actually conduct the work or a description of the process they will use to select the firm(s).

August Mack Environmental has been selected in consultation with Comte's insurer to conduct the work plan at the Comte site and to analyze the results of the other PRP consultants' work to determine the relationship of the Comte site with the Franklin Street Groundwater Site as set out in the SNL. A. Mack would also be retained to perform any subsequently required RI/FS. A. Mack is a highly respected and the technically proficient environmental consulting firm with a

strong background in the conduct of RI/FS studies. See http://augustmack.com/

5. A demonstration of Comte's capability to finance the RI/FS.

US.QBE is providing a defense to Comte under Claim No. 728834N, subject to a Reservation of Rights. Limits of coverage are sufficient to finance this RI/FS.

6. A statement of willingness by Comte to reimburse EPA for costs incurred in overseeing the conduct of the RI/FS.

Once our interim work plan has been completed and the results reviewed, Comte is willing to discuss reimbursement with EPA. However, without the results of our work plan, we are unable to enter these discussions now. We would urge EPA to renew its communications and negotiations with the unresponsive PRPs to determine if a mutually acceptable allocation of EPA's oversight costs can be negotiated with them and the responsive PRPs in this matter.

7. The name, address, and phone number of the party who will represent Comte in negotiations.

Gregory P. Cafouros
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Please accept this letter in response to your request for a good faith offer and contact me at your convenience to discuss our next steps.

Sincerely,

Kroger, Gardis & Regas, LLP

Gregory P. Cafouros

Enclosures

August Mack
ENVIRONMENTAL

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1302 North Meridian Street, Suite 300 ▪ Indianapolis, Indiana 46202

April 26, 2021

Victoria Comte Revocable Trust
c/o Mr. Greg Cafouros
Kroger Gardis & Regas, LLP
111 Monument Circle, Suite 900
Indianapolis, IN 46204

Re: Initial Site Investigation Work Plan
Comte Property/Former Richardson Cleaners
7 and 17 South Fletcher Avenue
Spencer, Indiana

Dear Mr. Cafouros:

August Mack Environmental, Inc. (August Mack), on behalf of Victoria Comte Revocable Trust, is submitting this Initial Site Investigation Work Plan for the above referenced Site.

August Mack trusts that this document meets with your approval. Please feel free to contact us should you have any questions or comments regarding this submittal.

Sincerely,

Richard Braun, CHMM
Project Manager

Sarah E. Young, CHMM
Senior Manager

INITIAL SITE INVESTIGATION WORK PLAN
FORMER RICHARDSON CLEANERS
7 & 17 SOUTH FLETCHER AVENUE
SPENCER, INDIANA

SUBMITTED TO:

Victoria Comte Revocable Trust
c/o Mr. Greg Cafouros
Kroger Gardis & Regas, LLP
111 Monument Circle, Suite 900
Indianapolis, IN 46204

PREPARED BY:

August Mack Environmental, Inc.
1302 North Meridian Street, Suite 300
Indianapolis, Indiana 46202

ISSUE DATE:

April 26, 2021

August Mack
ENVIRONMENTAL

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Figure 1: Site Plan with Proposed Soil Boring/Monitoring Well Locations

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Appendix A: Field Procedures

1.0 INTRODUCTION

August Mack Environmental, Inc. (August Mack), on behalf of Victoria Comte Revocable Trust, is submitting this Initial Site Investigation (ISI) Work Plan (WP). The ISI WP presents a plan to investigate the potential for soil and groundwater impacts at the Comte Site. The information obtained during the ISI will be used to evaluate next steps with regard to the Franklin Street Groundwater Site.

1.1 Site Description and Background Information

The Comte Site is located at 7 & 17 South Fletcher Avenue, Spencer, Indiana and encompasses two (2) parcels totaling approximately 0.31-acres comprised of a paved parking lot.

1.2 Objectives

Soil and groundwater analytical results collected during a 2015 Indiana Department of Environmental Management (IDEM) investigation revealed tetrachloroethene (PCE) in excess of the IDEM RCG SLs. The following are the objectives of the ISI:

- Research and review documents from database records and the local water utility to gather information regarding historical Site operations and areawide hydrogeology.
- Complete soil boring advancement on-Site for soil sample collection.
- Install a monitoring well network on-Site for groundwater sample collection and to determine groundwater flow direction in the uppermost portion of the aquifer.
- Prepare a Letter Report documenting activities and findings of the ISI.
- Develop a Conceptual Site Model for the Comte Site.

1.3 Potential Contaminants

Proposed PCs for this investigation are volatile organic compounds (VOCs) based on previous investigation activities performed by IDEM at the Comte Site and compounds reported in municipal water wells for the Bean Blossom Patricksburg Water Corporation.

2.0 DOCUMENT REVIEW

August Mack proposes to conduct the following document review to gather information regarding historical Comte Site operations and areawide hydrogeology:

- Review database records (e.g., EDR Radius Map Report with aerial photos, city directories, and Sanborn maps, Virtual File Cabinet) to confirm and document historical Site operations, optimize soil boring and monitoring well placement, and develop and support a Conceptual Site Model.

- Review publicly available information to determine if there are monitoring wells from other properties in Spencer that can be used to assess groundwater flow direction beyond the Site boundaries. If usable monitoring wells are discovered, August Mack will coordinate with other Respondents and attempt to engage with the facility owner/operator to obtain access or coordinate activities for groundwater elevation data collection.
- August Mack will coordinate with other Respondents and contact the Bean Blossom Patricksburg (BBP) Water Corporation to review publicly available documents (e.g., Wellhead Protection Plan, piezometer network data) to assess groundwater flow direction beyond the Site boundaries and obtain hydrogeologic information within the Wellhead Protection Area.

3.0 SOIL INVESTIGATION

August Mack proposes to advance five (5) soil borings on the Comte Site in the approximate footprint of the former dry cleaner, as well as points in presumed up, down, and cross-gradient of the former dry cleaner (see **Figure 1**).

- Borings will be advanced to the depth of groundwater (approximately 30 to 35 feet below grade (ft bg)) using a Geoprobe® direct-push sampling system.
    - Soil samples will be continuously collected as the borings are advanced.
    - Soils will be examined for lithologic description and evidence of contamination using a photoionization detector (PID).
    - Up to three (3) soil samples will be collected from each soil boring following U.S. EPA 5035A field preservation techniques. The samples exhibiting the greatest potential for impacts from the 0 to 10 ft bg interval, 10 to 20 ft bg interval, and the 20 to 30 ft bg interval will be submitted to a laboratory for analysis of VOCs using U.S. EPA SW-846 Method 8260C.
    - Appropriate Quality Assurance/Quality Control (QA/QC) samples will also be collected (e.g., field duplicate, matrix spike/matrix spike duplicate (MS/MSD), trip blank, equipment blank, and rinse blank) in general accordance with IDEM and U.S. EPA protocols.
    - A Level IV data package will be requested from the laboratory.

Field procedures are described in **Appendix A.**

4.0 GROUNDWATER INVESTIGATION

August Mack proposes to install five (5) permanent monitoring wells to investigate groundwater impacts at the Site and determine groundwater flow direction. Details are provided below.

4.1 Monitoring Well Installation

To enable the collection of representative groundwater samples utilizing low-flow sampling techniques (in general accordance with U.S. EPA and IDEM Micro-Purge guidelines), August Mack will install permanent, properly constructed monitoring wells per Indiana Department of Natural Resources regulations (specifically Indiana Code (IC) § 25-39-4-2, IC 25-17.6, IC 25-39, 312 IAC 12, and 312 IAC 13) and IDEM guidance.

August Mack is proposing to install five (5), 2-inch diameter Schedule 40 polyvinyl chloride (PVC) permanent monitoring wells with 10-foot machine slotted screen via hollow-stem auger equipment. The proposed well screens will bisect the water table present at the Site and be completed with a flush-mounted cover surrounded by a concrete pad.

Following installation, the monitoring wells will be developed with a submersible pump and surge block. Further description of well installation procedures are provided in **Appendix A**. The proposed monitoring well location is provided on **Figure 1.**

The top of casings of each newly installed monitoring well will be surveyed by a licensed professional surveyor along with approximate Site boundaries or any other pertinent Site features.[1] In addition, August Mack will attempt to coordinate survey efforts to tie Site survey points to off-Site monitoring wells identified in the area, including those proposed to be installed at 840 West Hillside Avenue and 401 West Morgan Street.[2]

4.2 Groundwater Monitoring

Following installation activities, the entire monitoring well network will be gauged and sampled via low-flow sampling techniques[3]. Groundwater elevations will be collected from the entire well network to determine Site-specific groundwater flow direction.

One (1) groundwater sample will be collected from each monitoring well and analyzed for VOCs. The following QA/QC samples will be collected and submitted for laboratory analysis:

- One (1) duplicate;
- One (1) MS/MSD;
- One (1) equipment blank;

[1] We anticipate the land surveyor using the Indiana State Plane Coordinate System; Horizontal Datum = NAD 1983; Vertical Datum – NAVD 1988.

[2] Addresses are associated with Respondents Stello Products and William and Teresa Gedig, respectively.

[3] The newly installed monitoring wells will be allowed to equilibrate at least 24 hours prior to sampling.

- One (1) trip blank; and
- One (1) rinse blank.

In addition, August Mack will attempt to gauge or coordinate activities of others to gauge identified off-Site monitoring wells, including those proposed to be conducted at 840 West Hillside Avenue and 401 West Morgan Street.[2]

Low-flow sampling procedures are provided in **Appendix A**.

5.0 CONTINGENT DEEPER MONITORING WELL INSTALLATION ACTIVITIES

If shallow groundwater impacts are identified as part of the investigation scope of work identified above, deeper wells will be installed in an on-Site location to characterize the potential for deeper impacts. It is anticipated the additional monitoring wells will be a nested or clustered pair installed using Rotosonic drilling techniques to approximately 60 ft bg and 95 ft (estimated depth of bedrock). Further, based on the ISI and contingent deeper monitoring well results, additional nested or clustered pairs of monitoring wells may also be installed in off-Site, downgradient locations to further characterize contamination and further develop the Conceptual Site Model.

6.0 FIELD INVESTIGATION AND REPORTING

Following completion of the field activities and receipt of all laboratory results, a letter report will be prepared. The report will summarize information obtained during document research and review for historical Site operations, off-Site monitoring well identification, and areawide hydrogeological information. The report will document sampling locations and activities and results of the investigation and will include a boring location plan, groundwater flow map, data tables and gauging records, boring logs, monitoring well construction diagrams, purge records, and copies of the analytical results. Additionally, August Mack will coordinate with the other Respondents to review and summarize newly generated data associated with their properties to whatever extent it is relative to the Comte Site. August Mack's report will be submitted in concert with reports from other Respondents. The report will be provided in draft form prior to finalization. A verbal summary of results can also be provided immediately upon receipt and evaluation of all laboratory analytical results against screening levels. This report is not designed to provide an evaluation of source areas or exposure pathways, full characterization of contaminants should they be identified, or recommendations on next

steps. This document also does not fulfill specific U.S. EPA reporting requirements (we have none at this time).

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FIGURE

Figure 1: **Site Plan with Proposed Soil Boring/Monitoring Well Locations**

APPENDIX A

August Mack Field Procedures

GEOPROBE® DRILLING SOIL SAMPLING PROCEDURES

Drilling will be performed in accordance with standard United States Environmental Protection Agency (U.S. EPA) protocols.

Select soil borings will be advanced using a Geoprobe® Direct Push Sampling System to the desired depth required for the investigation. Soil samples will be collected continuously from each boring location by pushing a 4-foot long nickel-plated core barrel sampler to the desired depth, recovering a continuous, undisturbed soil sample within a disposal acetate liner inside the core barrel sampler. A new acetate liner will be used for each sample collected. Upon retrieval, soil samples will be handled with new, clean nitrile sampling gloves to prevent cross-contamination between samples. All reusable equipment used to collect the soil samples will be decontaminated with a Liquinox® solution and rinsed with both tap water and distilled water between each boring location.

Upon retrieving the 4-foot sections of soil, the samples will be divided into 2-foot intervals, lithologically classified, and inspected in the field for evidence of contamination (odors, staining, etc.). A grab soil sample from each interval will be collected using field preservation method 5035A (terra cores) and placed immediately on ice in a cooler for preservation in the field. A portion of the soil from each interval will be placed into Ziploc bags will be screened in the field by headspace analysis using a MiniRae® photoionization detector. The results of the headspace analyses and lithological descriptions will be recorded on boring logs. Specific soil samples will be selected for analysis based on the field screening results and project objectives. Soil samples will be submitted to Pace Analytical Services, Inc. (Pace) for laboratory analysis using U.S. EPA SW-846 8260C.

MONITORING WELL INSTALLATION PROCEDURES

All drilling and well installation will be performed in accordance with Indiana Department of Natural Resources regulations (specifically Indiana Code (IC) § 25-39-4-2, IC 25-17.6, IC 25-39, 312 IAC 12, and 312 IAC 13) and IDEM guidance, under the direct supervision of August Mack personnel.

Hollow-stem augers will be used to drill a borehole to the desired depth of each well. The borehole will be checked for total open depth with a weighted, calibrated tape measure. A flush threaded well screen will be connected to riser pipe to achieve the desired screen length and well depth. Caps will be placed on the bottom and top of the well string and the string will be lowered through the augers to the desired depth. The screen filter pack consisting of coarse, washed filter sand (#5 sand) will be placed around the well screen by pouring the sand slowly into the hollow-stem augers. A weighted measuring tape will be used to ensure that bridging does not occur in the augers or borehole during installation of the filter pack. The hollow-stem augers will be slowly removed as the annular space is filled with sand. This process will continue until the sand pack extends no more than 2-feet above the top of the well screen.

After the sand pack is in place, a bentonite seal will be installed by slowly pouring bentonite pellets or chips through the hollow-stem auger. The depth of the bentonite seal will be continually measured, and this process will continue until the seal is determined to be at least 1.5-feet thick. Clean water will be added, and the bentonite will be allowed to hydrate for approximately 15 minutes. The remaining annular space will be filled with bentonite chips and the well will be completed with a flush-mount or pro-grade cover surrounded by a 2-foot by 2-foot concrete pad. The riser pipe will be cut approximately 2 to 3-inches below the opening of the manhole or protective cover. Following installation, the monitoring wells will be developed to produce water that is as free as practicable from sediment, drill cuttings, and drilling water via a submersible pump and a surge block.

Upon completion of well installation, well locations will be plotted on a scaled map and the top of the well casings and the ground level at each well will be surveyed to the nearest 0.01-foot to a local United States Geological Survey benchmark of known elevation. The development water and soil generated during well installation will be placed into 55-gallon drums and properly disposed.

GROUNDWATER LEVEL MEASUREMENTS

Water level measurements will be taken from each monitoring well prior to groundwater sampling. After removing the well cap, sufficient time will be allowed for the water level to equilibrate with the ambient air pressure. The water level indicator will be decontaminated before and after each use with a non-phosphate detergent wash, followed by tap water and distilled water rinses to prevent cross contamination.

Prior to water level measuring, the existing reference point on the well casing will be determined. A water level indicator probe will be slowly lowered into the well until the sound from the indicator is audible. The probe will then be slowly pulled out a few inches and dropped back down at smaller increments until the water level can be determined to within 0.01-feet. The water level will be measured based on an existing reference point on the well casing. Following sampling activities, the total depth of the well will be measured and recorded to the nearest 0.01-feet by allowing the measuring tape to contact the base of the well.

LOW-FLOW GROUNDWATER SAMPLING

Low-flow sampling will be conducted in general accordance with United States Environmental Protection Agency low-flow sampling procedures (U.S. EPA, 1996) and Indiana Department of Environmental Management Micro-Purge Sampling Guidance (IDEM, Revised 2017). Prior to groundwater sample collection, water level measurements will be collected from each well.

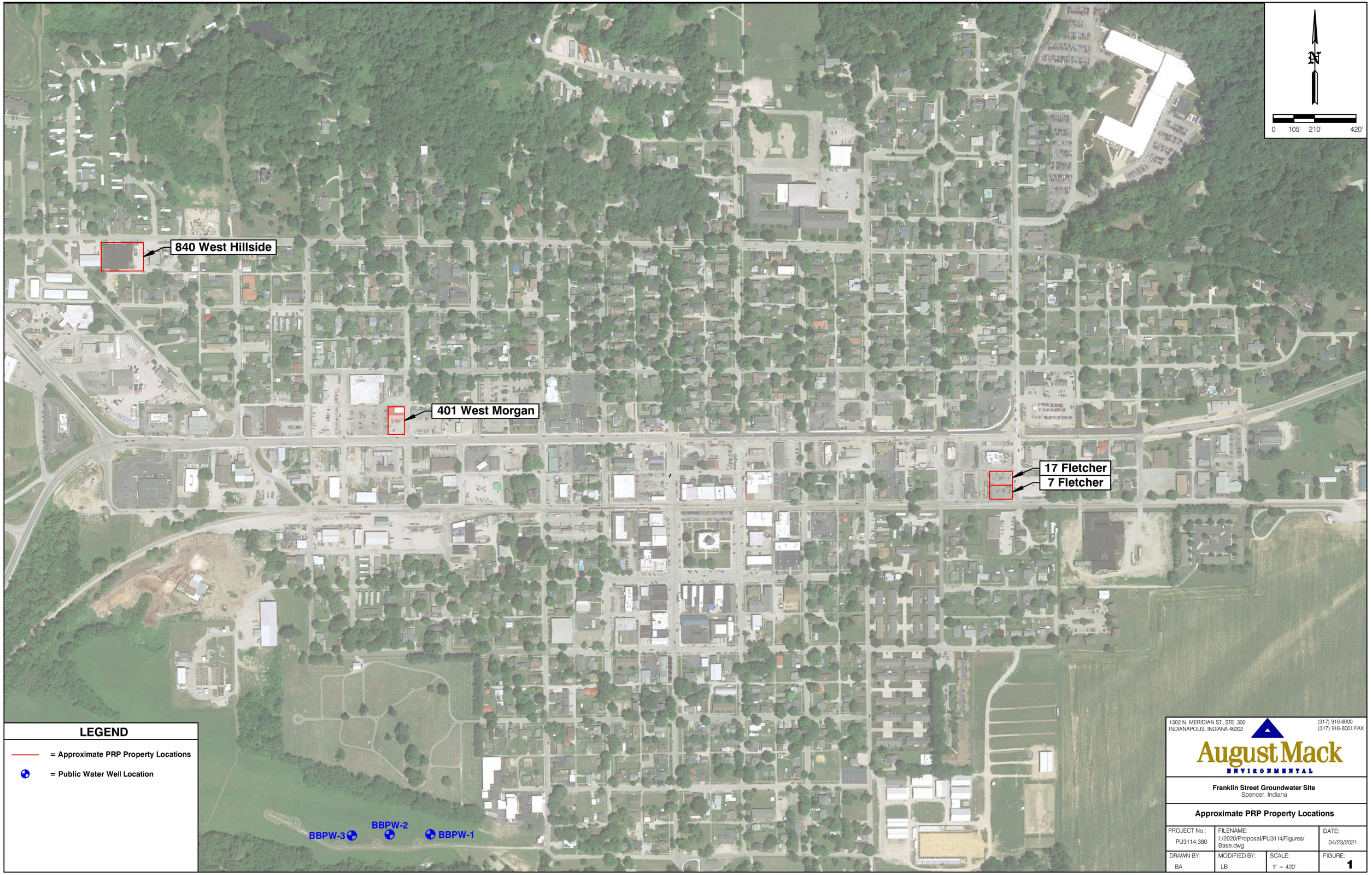
The water quality monitoring equipment will be placed inside the secondary containment to prevent direct contact between the equipment and site surface. August Mack will utilize a stainless-steel variable speed centrifugal pump or bladder pump to purge and sample the well. The pump will be decontaminated prior to purging and sampling using a phosphate-free detergent and triple rinsed using tap water and deionized water. The pump will be attached to Teflon® or fluorinated ethylene propylene lined tubing. New tubing will be used for each well, and the tubing will be discarded after each use. For each well, the pump will slowly be lowered into the water column and the submersible pump intake will be placed at approximately the midpoint of the groundwater zone within the screened interval.

In accordance with U.S. EPA guidance, flow rates for the well purging and sampling will be maintained below 1.0 liter/minute (generally within the range of 100 to 400 milliliter/minute) and drawdown of the aquifer will be continually measured to ensure that it remains less than 4-inches. During the well purging, groundwater physical and chemical characteristics will be measured using a multi-parameter meter connected to an in-line flow cell. These characteristics include: turbidity, dissolved oxygen, temperature, pH, specific conductivity, and oxidation reduction potential.

Once stable conditions are generally achieved, water samples will be obtained using low-flow equipment and collected in laboratory supplied sample containers. The purge water generated during well sampling will be containerized (using 55-gallon steel drum) and properly labeled pending proper disposal. Following sampling, the well will be closed and locked.

EQUIPMENT DECONTAMINATION

All equipment that will come in contact with the soil and groundwater will be decontaminated before and after use with a non-phosphate detergent wash, followed by distilled water rinses to prevent cross contamination. The hollow stem augers used to install the wells will be cleaned with a power washer and non-phosphate detergent wash inside a decontamination pad. All decontamination water generated during redevelopment and sampling activities will be containerized in properly labeled 55-gallon drums and stored on Site pending disposal.



LEGEND

= Approximate PRP Property Locations

= Public Water Well Location

1302 N. MERIDIAN ST., STE. 300
INDIANAPOLIS, INDIANA 46202
(317) 916-8000
(317) 916-8001 FAX

August Mack ENVIRONMENTAL

Franklin Street Groundwater Site
Spencer, Indiana

Approximate PRP Property Locations

PROJECT No.:	FILENAME:		DATE:
PU3114.380	I:/2020/Proposal/PU3114/Figures/Base.dwg		04/23/2021
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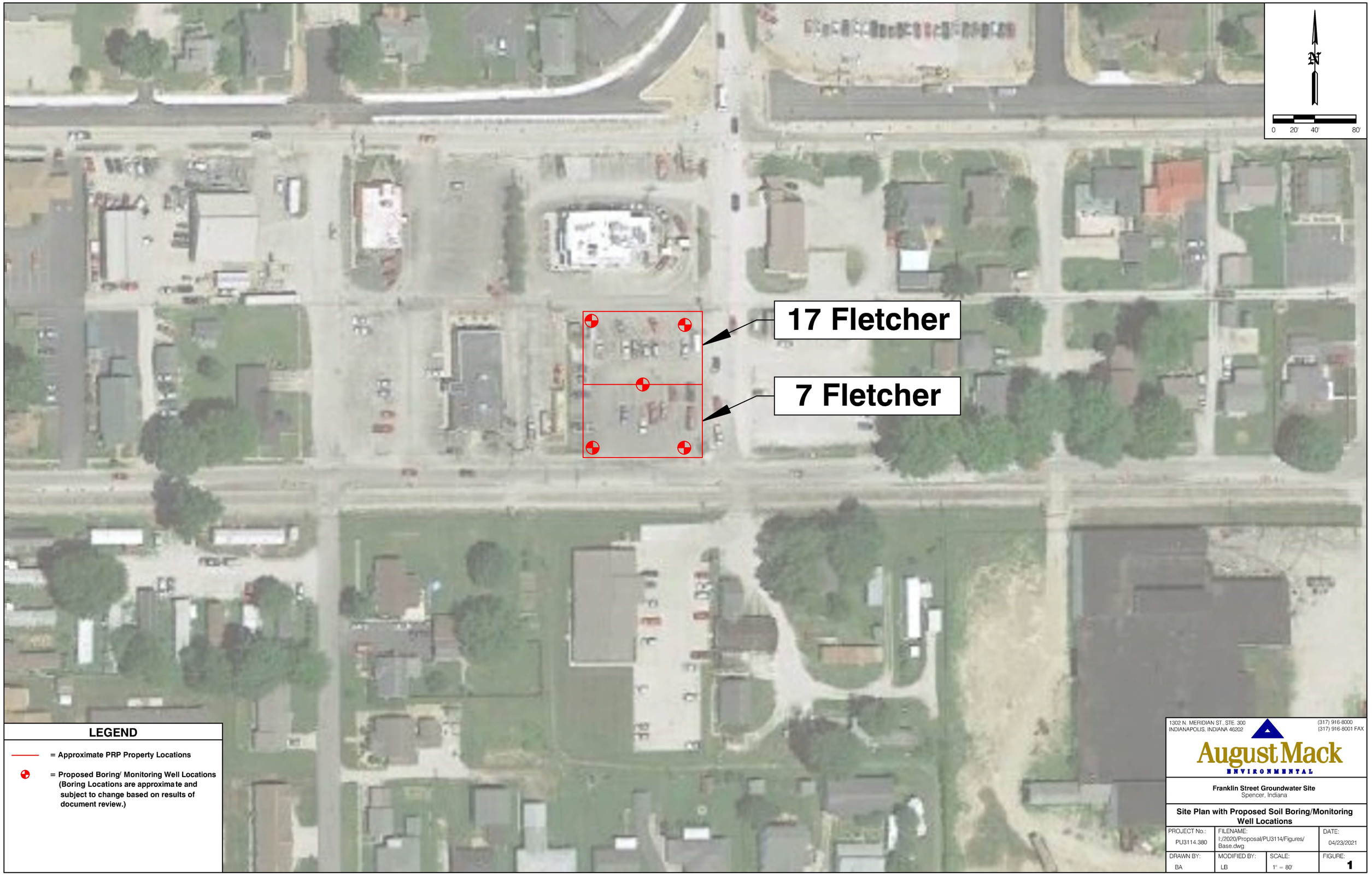

LEGEND

= Approximate PRP Property Locations

= Proposed Boring/ Monitoring Well Locations (Boring Locations are approximate and subject to change based on results of document review.)

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August Mack
ENVIRONMENTAL

Franklin Street Groundwater Site
Spencer, Indiana

Site Plan with Proposed Soil Boring/Monitoring Well Locations

PROJECT No.:	FILENAME:		DATE:
PU3114.380	I:/2020/Proposal/PU3114/Figures/Base.dwg		04/23/2021
DRAWN BY:	MODIFIED BY:	SCALE:	FIGURE:
BA	LB	1" = 80'	1